



Revised March 1, 2011

Amended PCB Removal Plan: City Square

AMENDMENTS TO PCB REMOVAL PLAN

INTRODUCTION:

NASDI, LLC, is proposing to change its method of packing and handling waste. The main reason is to reduce the cumbersome drums, excess waste and streamline shipments to landfills by loading waste into lined trailers. This method will reduce storage as well as reduce the need for drums.

The methods for removing PCB impacted stripes and collecting of the PCB bulk product and PCB remediation waste remain as described in the original contractor work plan. The amended revised packaging procedures:

OVERALL CHANGES:

The original work plan called for waste to be loaded into lined metal drums then shipped off to the disposal facility. The revised method will be to bag the waste in 6 mil poly bags that will then be loaded into 6-mil poly lined 30 yard dumpsters. Bagged waste shall be loaded into dumpster daily at end of shift. Bags shall be loaded into bobcat bucket and taken to dumpster and put in dumpsters. When dumpsters become full they will be swapped out and will not be stored elsewhere on site. Attachment B shows location of dumpster for loading from garage, as filled it will be swapped out and full dumpster will be transported off site for disposal.

In addition, to the proposed method, NASDI, LLC also would like to transfer currently drummed & bagged waste and put in 6-mil poly lined 30 yard dumpsters. Although the drums are currently lined, the weight of the bags do not allow for easy loading into a dumpster therefore NASDI proposes the follow method to transfer waste from drums to 6-mil poly lined 30 yard dumpsters:

- A full containment (wood construction) shall be erected and put under negative pressure
- A three chamber decon facility shall be constructed
- A propane run forklift with dumping capacity will be within containment. See Attachment C for the special forklift drum carrier/rotator that will allow for dumping into dumpster
- Containment shall be erected to encompass current storage area and facilitate holding two dumpsters that shall be loaded
- Construction of containment shall allow room for the loading and dumping of waste
- Once dumpsters are loaded and sealed, the loading area cleaned and wiped down; then dumpsters can be moved out and new empty dumpsters can be brought in for loading
- Note that decontamination of items in loading area will follow the previous approved plan
- This process shall only be used to address current drums on-site and all drums shall be wiped clean before moving out of area. Based on current drums on-site NASDI anticipates about 10 dumpsters to empty the existing drums. Dumpsters will be swapped out when full and new empty placed in area.



NASDI feels that these changes will:

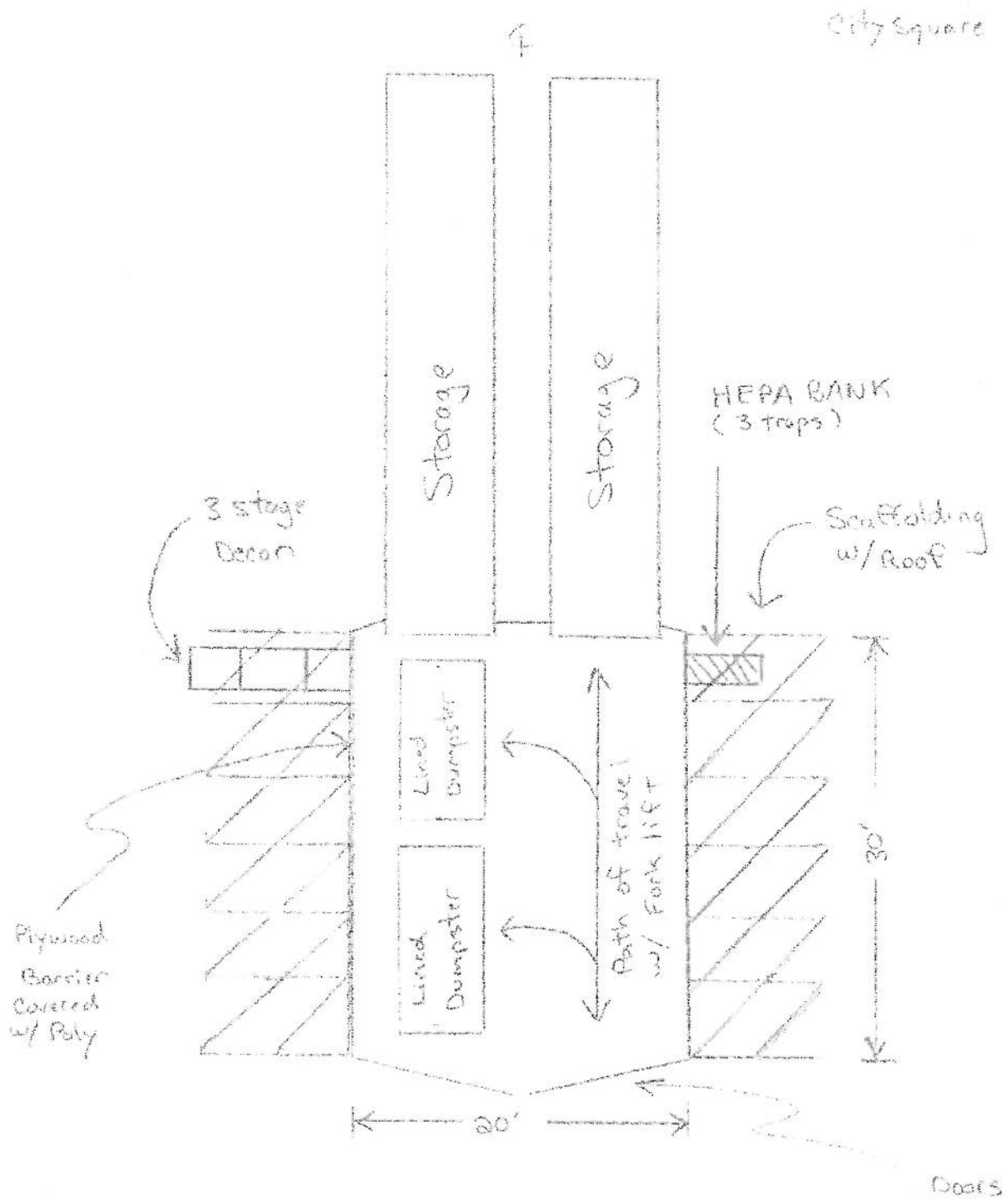
- Expedite the loading and moving of waste
- Speed up the process of removal as there will be no moving heavy and cumbersome drums
- Streamline the process for disposal of waste to the landfill the most productive and effective way
- Reduce the need for storage containers to hold drums and have a dedicated trailer for waste
- Less handling of materials

In summary, our efforts put forth are meant to improve the process of removal and ensure a safe work environment for employees as well as protect the public. Attachment A contains layout for Debris Waste Transfer Plan; Attachment B is Waste Disposal Plan and Attachment C will be forklift information.

Submitted By: Michael F. Tibert
Director of Environmental Health & Safety



ATTACHMENT A
DEBRIS WASTE TRANSFER PLAN



DEBRIS WASTE TRANSFER PLAN

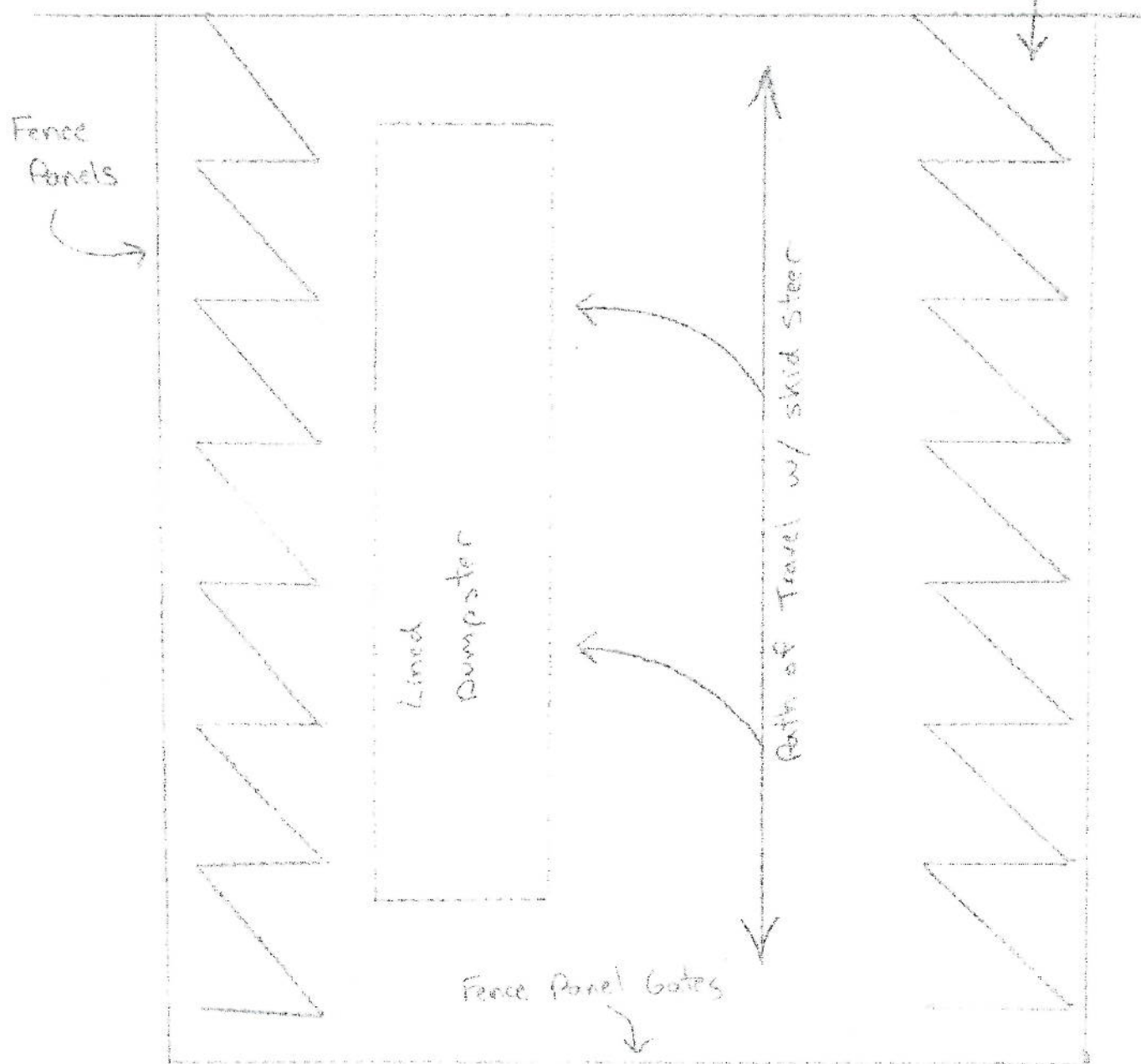


ATTACHMENT B
WASTE DISPOSAL PLAN

City Square

Existing Garage

Scaffolding
w/ Roof



WASTE DISPOSAL PLAN



ATTACHMENT C
FORKLIFT INFORMATION

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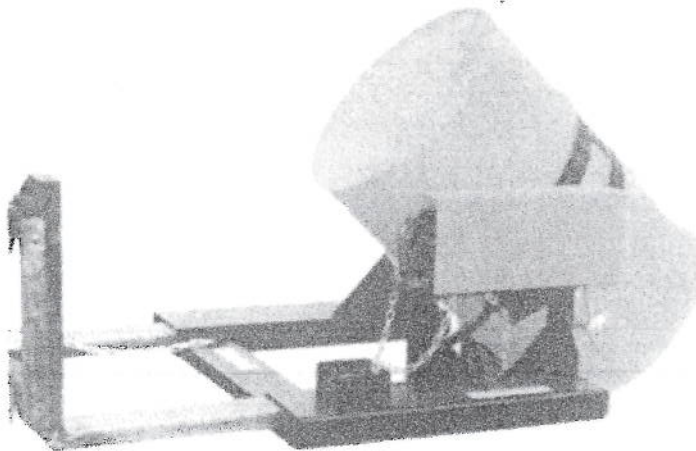
Vestil Fork Truck Drum Carrier Rotator 800-Lb. Capacity, Model# DCR-205-8

Item# 856167

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Qty

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DESCRIPTION

PRODUCT Q & A

WARRANTY

OVERVIEW

This product allows 55 gallon steel drums to be easily transported and rotated using a forklift. U.S.A.



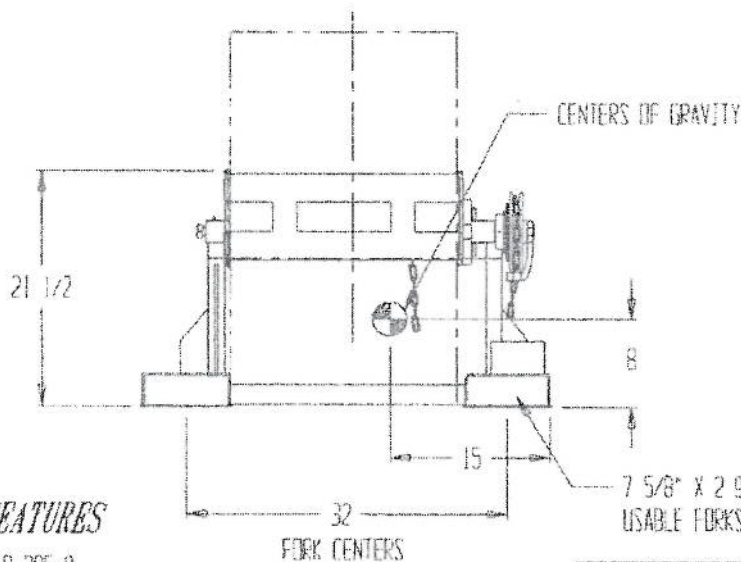
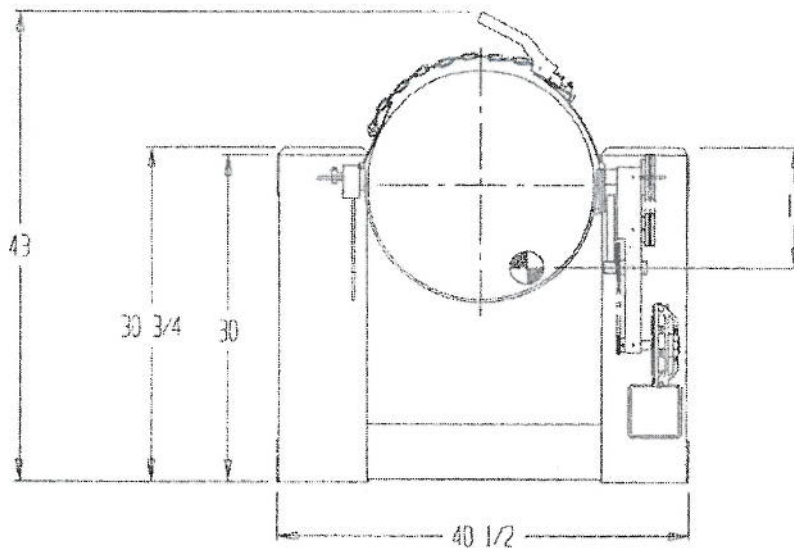
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KEY SPECS

Manufacturer Warranty 3

Ship Weight 2

FORK MOUNTED DRUM CARRIER/ROTATOR DCR-205-8



SPECIAL FEATURES:

NONE

STANDARD FEATURES

MODEL NUMBER: DCR-205-8
CAPACITY: 800 LBS.
OVERALL WIDTH: 40"
OVERALL LENGTH: 43"
OVERALL HEIGHT: 21 1/2"
ROTATION METHOD: CHAIN OPERATED
CRANK TURN PER 90° ROTATION: 7 1/2
ACCEPTABLE DRUM TYPE: 55 GALLON
FORK CENTERS: 32"
USABLE FORK POCKETS: 7 5/8" X 2 9/16"
INCLUDES 15 FOOT CHAIN FOR MANUAL ROTATION

**SPECIAL UNITS ARE NON-RETURNABLE
*AVAILABLE AT ADDITIONAL COSTS

PRODUCTION WILL START UPON
RECEIPT OF SIGNED APPROVAL
DRAWING

APPROVAL

I, the undersigned, hereby approve this print
[] As drawn [] As marked

This includes my approval of design & dimensions

Signed _____

Date: _____

DISTRIBUTOR'S NAME:

T & S EQUIPMENT

DRAWN BY: S. ROSE

DATE: 7-29-04

REFERENCE:

P.O. #:

V.O.W.:

SALES:

DWG. FILE NAME:

scale: NTS

09-007-001